

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Melissa M. Caldwell
Debtor

Case No. 1:24-bk-00927-HWV
Chapter 13

SECOND MOTION TO EXTEND TIME
FOR FILING ALL REMAINING DOCUMENTS

AND NOW, this 29th day of May, 2024, comes the above Debtor, by her counsel, CGA Law Firm, and files the within Motion averring that:

1. The within Motion is brought pursuant to Bankruptcy Rule 1007 in that it seeks to extend the time in which the Debtor must file all remaining documents.
2. A Motion to Extend Time for filing Requisite Schedules was filed on April 29, 2024. An Order was entered on May 5, 2024 granting the Debtor thirty (30) days additional days within which to file the requisite schedules.
3. The Debtor has provided the initial paperwork to process the Plan and Schedules; however, after the initial processing of the case, additional information is needed in order to complete the schedules and calculate a Chapter 13 Plan which the Debtor have not yet provided to Counsel. Due to the expedited and hurried nature in which this petition was filed and due to the additional information needed in this case, there is insufficient time for the Debtor to compile the necessary information and to complete the requisite schedules by May 29, 2024.
4. The Debtor request an extension of thirty (30) days to file the requisite schedules.

WHEREFORE, the Debtor requests an extension of time of thirty (30) days in which to file all remaining documents to accompany her emergency bankruptcy petition.

Respectfully submitted,
CGA Law Firm

By: /s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire
Sup. Ct. ID No. 323803
135 N. George St. York, PA 17401
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(Counsel for Debtor)

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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2024, a true and correct copy of the foregoing Motion to Extend Time for all remaining documents was or will be sent to the following by CM / ECF:

Office of the U.S. Trustee

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire

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**ORDER GRANTING SECOND MOTION TO EXTEND TIME TO
FILE ALL REMAINING DOCUMENTS**

AND NOW, upon consideration of the Motion filed by the Debtor seeking to have the time in which to file all remaining documents extended, it is hereby

ORDERED that the time within which the Debtor must file all remaining documents be extended an additional thirty (30) days.

BY THE COURT,